



4301 Connecticut Ave NW  
Suite 300  
Washington DC 20008  
T 202.244.4700 / 800.424.2869  
F 202.966.4818

April 11, 2014

Administrator Karl Brooks  
U.S. Environmental Protection Agency  
Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Dear Mr. Brooks:

This letter responds to comments presented in a document by Peter N. Anderson submitted to public officials titled "The West Lake-Bridgeton Landfill Fire: A Perfect Storm." In light of the seriously false claims and unfounded fears that the document suggests, the National Waste & Recycling Association (NW&RA) is submitting this letter to correct the public record and address some of the author's assumptions and misinterpretations made in the document.

Republic Services, Inc. is working with both state and federal regulators to address the issues and is following up as appropriate. The actions taken by Republic are based on careful investigation of the issues by experts. Republic continuously monitors the site and has been transparent in providing information to the regulators. Mr. Anderson, a long-standing opponent of landfills and the waste industry in general, is not a scientist by training and has no technical expertise qualifying him to comment on the complex scientific assertions in his document.

The document does not accurately portray the reality of the Bridgeton or West Lake Landfills, misuses data and incorporates inaccurate assumptions to establish untrue and unrealistic scenarios. While we leave a detailed rebuttal to those familiar with the sites, we wish to respond to some of the misrepresentations upon which Mr. Anderson's fear-inducing claims have been based.

- Despite the document's assertions, the EPA has repeatedly stated that the West Lake Landfill poses no risk to human health outside the fenced areas of the site.

- The document “normalizes” landfill temperatures, which is not accepted scientific practice. Mr. Anderson simply inflated the measured gas temperatures without providing any technical support for changing the monitored results. Republic’s monitoring results are consistent with industry standards and are used routinely for Clean Air Act compliance.
- As he has done in other attacks on the industry, Mr. Anderson fundamentally misunderstands and misrepresents the gas collection and control system (GCCS), ignoring the fact that these systems are designed, managed and operated in a manner to safely and effectively remove landfill gas while preventing the introduction of oxygen into a landfill.
- Many of Mr. Anderson’s purported risks are dependent on the occurrence of methane and thorium explosions, which he believes have a high potential. However, below 12% oxygen, methane cannot be ignited, which means that an explosion cannot occur. The landfill does not have oxygen present at such high levels. The oxygen levels are even lower in deep seated areas where temperatures are presumably the highest. For thorium, the U.S. Department of Energy document referenced by Mr. Anderson refers to a metallic form of thorium. The thorium in West Lake Landfill is present as sulfates that are not capable of pyrolysis.
- The document also misrepresents the liquids collection system within the Landfill. Mr. Anderson repeatedly asserts that pumps to remove liquid from the landfill have been removed, resulting in only perimeter collection. But in fact, there are six leachate collection sumps installed and in operation across the site. Within the past year, additional liquid collection has been added within the landfill area, including at numerous gas collection wells, further assisting with liquids evacuation from the site. This incorrect assumption leads to nearly every groundwater conclusion Mr. Anderson erroneously makes.

The comments presented herein should be taken into account while reviewing the document presented by Mr. Anderson in order to avoid the misconceptions that are contained in it and ensure that it is read in the proper context.

The Bridgeton Landfill permitting, construction and operation was pursuant to the solid waste regulations applicable at the time of its operation. Republic Services and its subsidiary Bridgeton Landfill, LLC have made tremendous efforts to work cooperatively with overseeing agencies and manage the challenges presented by these sites.

I am convinced that Republic Services, Inc., along with its subsidiaries, Bridgeton Landfill, LLC and Rock Road Industries, Inc., are committed to the safe management of both sites and best practices of the landfill industry. They are the unfortunate target of a baseless attack by Peter Anderson.

Factual information and data reporting can be found on both sites at [www.bridgetonlandfill.com](http://www.bridgetonlandfill.com) and [www.westlakelandfill.com](http://www.westlakelandfill.com), as well as through federal and state websites:

[http://www.epa.gov/region7/cleanup/west\\_lake\\_landfill/](http://www.epa.gov/region7/cleanup/west_lake_landfill/);  
<http://www.dnr.mo.gov/Bridgeton/>; and  
<http://health.mo.gov/living/environment/bridgeton/>.

We appreciate the opportunity to correct the record.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon H. Kneiss".

Sharon H. Kneiss  
President & CEO  
National Waste & Recycling Association

